

# EXHIBIT 81

## CONFIDENTIAL

In accordance with a protective order, the enclosure(s) shall be treated as confidential and shall not be shown to any person other than those persons designated in paragraph 8.2 of the paragraph order.

## CLEARY GOTTLIEB STEEN &amp; HAMILTON LLP

2112 Pennsylvania Avenue, NW  
Washington, DC 20037-3229  
T: +1 202 974 1500  
F: +1 202 974 1999  
clearygottlieb.com

NEW YORK  
PARIS  
BRUSSELS  
LONDON  
FRANKFURT  
COLOGNE  
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ROME  
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GEORGE S. CARY  
MITCHELL S. DUPLER  
GIOVANNI P. PREZIOSO  
DAVID L. GELFAND  
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ROBIN M. BERGEN  
DEREK M. BUSH  
BRIAN BYRNE  
JEREMY CALSYN  
LEA M. BROWN  
MATTHEW C. SOLOMON  
ELAINE EWING  
NOWELL D. BAMBERGER  
DANIEL P. CULLEY  
KENNETH S. REINKER  
MACEY LEVINGTON  
RESIDENT PARTNERS  
KENNETH L. BACHMAN, JR.  
DANIEL B. SILVER  
RICHARD DEC. HINDS  
SARAH D. SCOTLAND  
WILLIAM B. MCGURN III  
JOHN S. MAGNEY  
MARK LEDDY  
JOHN C. MURPHY, JR.  
DAVID M. BECKER  
JANET A. WELLER  
LINDA J. SODA  
MICHAEL H. KRIMMINGER  
MATTHEW D. SLATER  
SENIOR COUNSEL  
W. RICHARD DODTRUP  
STEVEN J. KAISER  
KATHLEEN EDWARD BRADISH  
CUNZHENG HUANG\*\*  
CHASE D. KANECKI  
CARL LAWRENCE MALM  
CHARLES STERLING  
CARL F. EMIGHOLZ  
JOHN P. MCGILL, JR.  
RESIDENT COUNSEL  
MATTHEW J. RACHRACK  
LARRY C. DEMBOWSKI  
PATRICK FULLER  
SAIF I. SHAH MOHAMMED  
CHRISTIAN J. MAHONEY  
SENIOR ATTORNEYS  
EMILY M. ARNOLD  
NICO BANKS  
GRAHAM BANNON  
HANI BASHOUR  
TAYLOR H. BATES  
LINDEN BERNHARDT  
JORGE A. BONILLA LOPEZ  
JACKIE M. BRUNE\*  
JOSEPH H. BURSON  
MADISON C. BUSH  
ALEXIS D. CAMPBELL  
NICHOLAS ELIAS CARY  
SAMUEL C. CHANG  
OHINWE T. CHUKWUGO  
EVERETT K. CORA  
MARKANTHONY CURTIS  
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GABRIEL J. LAZARUS  
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MEGAN LINDGREN  
MAIA LIVINGGOOD  
MICHAEL L. MANN  
SHANNON MANNLEY  
JACK MASSEY\*\*  
NORA MCCLOSKEY  
BETHLEHEM MEEBRAU  
KELSEY NUSSENFELD  
AMBER V. PHILLIPS  
CALEB J. ROBERTSON  
BEN ROSENBLUM  
MICHAEL G. SANDERS  
MICHAEL SCHULMAN

WILLIAM SEGAL  
DAVID SEIDMAN  
GARRETT D. SHINN  
TOM STANDIFER\*  
NICOLE TATZ  
ISABEL M. TUZ  
ZACH TSCHIDA  
TRACEY H. ZHANG  
ASSOCIATES

\* Admitted only to a bar other than that of the District of Columbia. Working under the supervision of principals of the Washington office.

\*\* Special Legal Consultant, qualified in the People's Republic of China.

Derek M. Bush: +1 (202) 974-1526  
dbush@cgs.com

CONFIDENTIAL TREATMENT REQUESTED

August 5, 2021

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Mo. 64198

Attn: Ms. Esther George  
President and Chief Executive Officer, Federal Reserve Bank of Kansas City

Re: Application by Avanti Financial Group, Inc. (d/b/a Avanti Bank & Trust) for Federal Reserve Membership.

Ladies and Gentlemen:

On behalf of our client Avanti Financial Group, Inc. (d/b/a Avanti Bank & Trust) ("Avanti"), a Special Purpose Depository Institution chartered in Wyoming, please find attached Avanti's application (the "Application") to the Federal Reserve Bank of Kansas City (the "FRBKC") to become a member of the Federal Reserve System. Avanti already has received Wyoming approval of its charter, and Avanti is not planning on applying for insurance with the Federal Deposit Insurance Corporation. The information contained in the Interagency Charter and Federal Deposit Insurance Application is provided in support of the Federal Reserve Membership Application.

Avanti requests confidential treatment for the Confidential Version of this Application, the Confidential Exhibits thereto and the enclosed Interagency Biographical and Financial Reports (together, the "Confidential Information"), including pursuant to the Freedom

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Confidential Treatment Requested

of Information Act, 5 U.S.C. §§ 552(b)(4), (b)(6) and (b)(8), and the implementing regulations of the Board of Governors of the Federal Reserve System (the “Federal Reserve Board”) thereunder. The Confidential Information includes privileged and confidential commercial and financial information, proprietary in nature, that is not available to the public from any other source. Disclosure of this information to the public, including competitors of Avanti, would provide such competitors and others with information about the confidential financial and business plans, prospects, profitability, and operations of Avanti. From this information, competitors could make inferences about operations and competitive strategies that could potentially result in altering the competitors’ own competitive strategies and relationships to the detriment of Avanti. Certain information in the Application also includes confidential supervisory information and personal financial information with respect to private individuals, the public disclosure of which would constitute a clearly unwarranted invasion of personal privacy. Avanti further requests that if, notwithstanding the foregoing, the FRBKC or the Federal Reserve Board should determine preliminarily to make available to the public any of the information contained in the Application or its exhibits, it will inform Avanti prior to doing so in order that we may discuss the matter further.

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If you have any questions or we can provide any further information regarding the Application, please do not hesitate to contact me (tel. no. (202) 974-1526; dbush@cgsh.com) or Chuck Thompson, General Counsel of Avanti (chuck@avantibank.com).

Very truly yours,



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Derek M. Bush

cc: Ms. Tara Humston  
Ms. Christi May-Oder  
Ms. Jackie Nugent  
Federal Reserve Bank of Kansas City

Caitlin Long, Esq.  
Charles Thompson, Esq.  
Avanti Bank & Trust

Derek M. Bush, Esq.  
Gabriella Okafor, Esq.  
Cleary Gottlieb Steen & Hamilton LLP